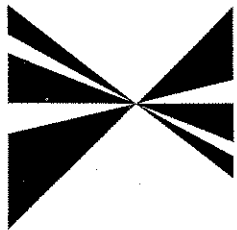


Attachment 5

Additional Public Comment Letters

SOUTHERN CALIFORNIA



**ASSOCIATION of
GOVERNMENTS**

Main Office

818 West Seventh Street

12th Floor

Los Angeles, California

90017-3435

t (213) 236-1800

f (213) 236-1825

www.scag.ca.gov

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David Gafin, Downey • Eric Garcetti, Los Angeles •
Wendy Greuel, Los Angeles • Frank Gurulé, Cudahy •
James Hahn, Los Angeles • Janice Hahn, Los Angeles •
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Paul Nowatka, Torrance • Pam O'Connor, Santa Monica •
Alex Padilla, Los Angeles • Bernard Parks, Los Angeles •
Jan Perry, Los Angeles • Ed Reyes, Los Angeles • Greig Smith, Los Angeles •
Tom Sykes, Walnut • Paul Talbot, Alhambra • Sidney Tyler, Pasadena •
Tonia Reyes Uranga, Long Beach • Antonio Villaraigosa, Los Angeles •
Dennis Washburn, Calabasas • Jack Weiss, Los Angeles •
Bob Yousefian, Glendale • Dennis Zine, Los Angeles

Orange County: Chris Norby, Orange County •
Christine Barnes, La Palma • John Beauman, Brea •
Lou Bone, Tustin • Art Brown, Buena Park • Richard Chavez, Anaheim •
Debbie Cook, Huntington Beach • Cathryn DeYoung, Laguna Niguel •
Richard Dixon, Lake Forest • Marilyn Poe, Los Alamitos •
Tod Ridgeway, Newport Beach

Riverside County: Jeff Stone, Riverside County •
Thomas Buckley, Lake Elsinore • Bonnie Flickinger, Moreno Valley •
Ron Lloveridge, Riverside • Greg Pettis, Cathedral City •
Ron Roberts, Temecula

San Bernardino County: Gary Oviatt, San Bernardino County •
Lawrence Dale, Barstow • Paul Eaton, Montclair •
Lee Ann Garcia, Grand Terrace • Tim Jasper, Town of Apple Valley •
Larry McCallon, Highland • Deborah Robertson, Rialto • Alan Wapner, Ontario

Ventura County: Judy Mikels, Ventura County •
Glen Becerra, Simi Valley • Carl Morehouse, San Buenaventura •
Toni Young, Port Hueneme

Orange County Transportation Authority: Lou Correa, County of Orange

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Keith Millhouse, Moorpark

June 20, 2005

Ms. Connie Chung
Community Studies I Section
Los Angeles County
Department of Regional Planning
320 W. Temple Street
Los Angeles, CA 90012

RE: SCAG Clearinghouse No. I 20050344 RADV200500007 Density Bonus Ordinance

Dear Ms. Chung:

Thank you for submitting the **RADV200500007 Density Bonus Ordinance** for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

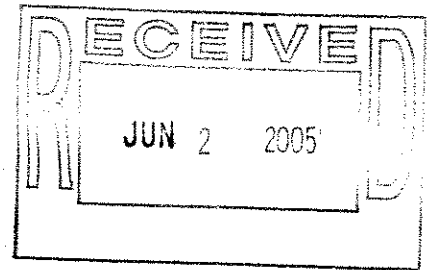
We have reviewed the **RADV200500007 Density Bonus Ordinance**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's **May 16-31, 2005 Intergovernmental Review Clearinghouse Report** for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1851. Thank you.

Sincerely,

BRIAN WALLACE
Associate Regional Planner
Intergovernmental Review





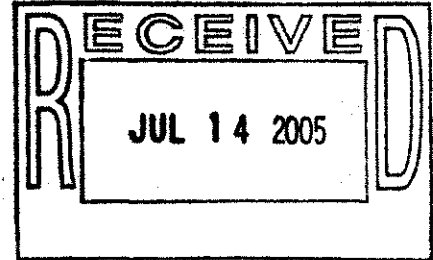
Erroy D. Baca, Sheriff

County of Los Angeles
Sheriff's Department Headquarters

*4700 Ramona Boulevard
Monterey Park, California 91754-2169*



July 6, 2005



Julie Moore, AICP
Supervising Regional Planner
Community Studies I Section
Department of Regional Planning
County of Los Angeles
320 West Temple Street
Los Angeles, California 90012

Dear Ms. Moore:

**REVIEW ENVIRONMENTAL DOCUMENT
NOTICE OF CONSULTATION PROJECT NO. RADV200500007
DENSITY BONUS ORDINANCE**

This is in response to your letter dated May 19, 2005, requesting our Department's review of the above identified project. We have completed our review and assessment of the project description and plans. While we understand that the proposed amendment to the Zoning Ordinance is needed, it is difficult to ascertain the potential impact to the level of public and safety services without a specific location being identified.

Furthermore, since our Department is not involved in the building permitting process for residential units, it will be difficult to monitor the impact to increases in population as a result of the proposed revision to the Zoning Ordinance. As indicated on page 21 of the Notice of Consultation, under Services-4., Sheriff's Services, item b, the Sheriff's Department does not have an established financial mechanism to sufficiently support a desirable level of services in the County's unincorporated area. It is also not clear the what level of involvement and approval authority in the subsequent environmental review process the Sheriff's Department will have. Therefore, we respectfully request the Sheriff's Department be given the opportunity to be involved in the review/approval process for every new project that qualifies under the proposed revision to the Density Bonus Ordinance.

Julie Moore

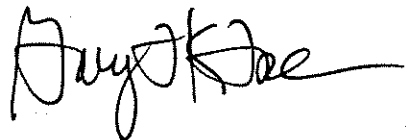
-2-

July 6, 2005

Should you have any questions regarding this matter, please contact Mr. Mike Kameya, of my staff at (626) 300-3013.

Sincerely,

LEROY D. BACA, SHERIFF

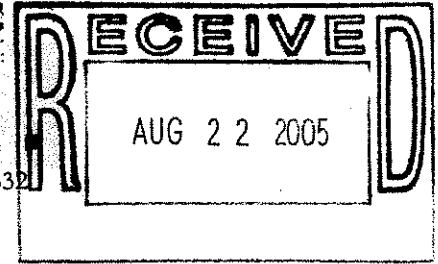
A handwritten signature in black ink, appearing to read "Gary T. K. Tse", with a long horizontal flourish extending to the right.

Gary T. K. Tse, Director
Facilities Planning Bureau



AMCAL

30141 AGOURA RD. ♦ STE. #100 ♦ AGOURA HILLS, CALIF. ♦ 91301-4332
PHONE: (818) 706-0694 ♦ FAX: (818) 889-9158



August 25, 2005

Regional Planning Commission
C/O Ms. Connie Chung and Ms. Julie Moore
Los Angeles County
320 W. Temple Street
Los Angeles, CA 90012

Re: Suggested Revisions to Amendments to County Code (Title 22 - Zoning Ordinance)

Honorable Commissioners and Staff:

Thank you for the opportunity to comment on your proposed code amendments, intended in part to address the crippling housing crisis affecting our community. I urge you to approve the proposed Amendments for Title 22 related to density bonuses and affordable housing provisions which were discussed at the hearing on June 22, 2005 while also considering the following suggestions.

The development of affordable housing is facilitated greatly by:

1. reducing the time to procure entitlements,
2. reducing the number of cost-triggering code requirements - especially untenable parking ratios,
3. allowing increased densities and heights via "by right" regulations - rather than by zone changes/plan amendments that require protracted and contentious hearing and approval processes.

The following are our suggestions and comments:

1. Section 22.52.1850: Create maximum parking ratios for affordable housing of 1.0 space per 0-2 bedrooms, 1.25 per 3-bedrooms, and 1.5 for 4-bedrooms. Also, allow a 'by-right' parking reduction of 25%.
 - a. The cost of a subterranean parking stall is \$25,000-30,000. This money is spent better true quality of life accoutrements, such as nicer architectural design; more playgrounds, pools and barbecue areas for residents; and more apartment units to house working families -- not for parking spaces.
 - b. Commissioners at the June 22 hearing were concerned that the extra cars of residents/guests would 'overflow' into existing neighborhoods.
 - i. This problem can be mitigated by residential on-street parking permits. They can limit the number cars that can be parked during given periods, and reserve that street parking for only residents and their guests.
 - ii. Understand that driving and parking are not rights, but instead are societal privileges. If the demand for parking spaces exceeds the supply, the solution is not to build more spaces. The solution is to encourage people to use 'alternative' transportation such as walking, bicycles, carpooling, buses, and light rail.
 - iii. At AMCAL's Castelar family affordable apartments in Chinatown, 101 spaces adequately serve 101 1, 2, and 3-bedroom households. During any given assessment period, only 85% of spaces are used, and there is little excess demand.
 - iv. Please review Donald Shoup's study on car ownership and income ("The Trouble with Minimum Parking Requirements"). He clearly and empirically demonstrates



AMCAL

5743 Corsa Ave. ♦ Ste. 208 ♦ Westlake Village, Calif. ♦ 91362-4027
Phone: (818) 706-0694 ♦ Fax: (818) 889-9158

- that low-income residents who live in urban areas with shops, amenities, and mass transit nearby statistically own fewer cars than wealthier suburban residents.
- c. The annual cost of driving one car is \$4,000-8,000. Households with enough money to afford two cars often do not qualify to live in affordable developments, which have specific income limits.
2. Section 22.08-20-24: We support the elimination of the requirement for a CUP for a density bonus for affordable housing in a Commercial zone; instead requiring only Director's Review.
- a. Entitlements that require public hearings (zone changes, general plan amendments, parking permits, CUPs, etc.) stretch the time to develop affordable projects to over nine (9) months. In the meantime, carrying costs to pay for the land purchase increases, further limiting developers' ability to provide additional units of housing.
 - i. Money should not be wasted 'carrying' land; it should be spent to build a better housing project and to build more affordable units.
 - b. Financing for affordable housing via the state and federal tax-credit mechanisms requires short timelines for entitlements/ building permits and reasonable budgets.
 - i. Eliminating the requirement for public hearings for density bonuses and making them "by right" will shorten the development schedule, reduce land carrying costs, and accordingly reduce the financial risk - all of which will immediately incentivize the development of more affordable housing.
 - c. Opposition by neighbors is almost guaranteed for every affordable development, and many arguments are irrelevant to the code and public policy. This opposition needlessly wastes staff time and causes unneeded delays.
3. Eliminate public appeals of Director's Review and make the affordable approval process truly 'by right.'
- a. Every affordable project will be appealed, if neighbors are given the opportunity.
 - b. Commissioners were concerned that neighbors would have no 'recourse' on these land use issues.
 - i. This problem can be mitigated by the existing consideration process being overseen by the Commission, who are appointed by Supervisors and directed to act in the public interest.
 - ii. Furthermore, the State has determined that the need to resolve the housing crises trumps neighborhood input on land use decisions that involve affordable housing.
4. Section 22.52.1840: List of specific concessions.
- a. Low densities, low building heights and deep setbacks prevent the development of the number of units required to create "economies of scale" needed for feasible construction budgets.
 - i. Castelar family affordable apartments in Chinatown has a high density of 96 DUA, yet the project receives positive reviews from its residents, lauds from the community and agency staff, and numerous architectural awards.
 - b. Number of concessions: Memorialize all three concessions, not "one to three."
 - c. We support waiver for public works improvements: Public works improvements can increase the cost of affordable projects by several \$100,000s.
 - d. We support density bonuses greater than those in 22.52.1830. Increased density will create construction 'economies of scale.'
5. Section 18 (Sec. 22.44.100): Revise to read "Except as otherwise expressly prohibited within a community standards district..."
- a. Permits higher density affordable housing to be built 'by right,' except if specifically prohibited, rather than only if it is specifically allowed.



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Approval and implementation of these amendments will lead to more affordable units in the County, which the County clearly states as a goal. Further, I entreat you to not be limited by the 'suggestions' promulgated by SB1818. That legislation was developed for an 'average' community anywhere in the State. Los Angeles County is by no means average – not in our lack of housing options, our population growth projections, or our costs of developing and building housing. Fortunately we are also not limited by the political bargaining and marginalizing clearly reflected in SB1818. You have the opportunity to truly make an impact, for the better, in many people's lives. Please do so.

Thank you for your consideration.

Sincerely,



Sean G. Hyatt
Director of Development

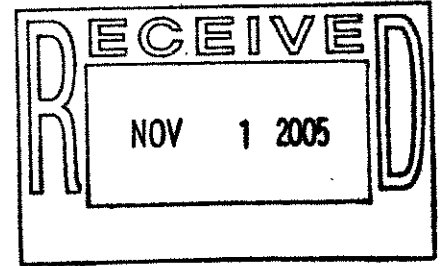
¹ "The Trouble With Minimum Parking Requirements," Donald C. Shoup, Department of Urban Planning, School of Public Policy and Social Research, University of California, Los Angeles (UCLA) 9 December, 1999. Originally Published in Transportation Research Part A Vol. 33 (1999), pp. 549-574
Posted at the *Victoria Transport Policy Institute* website with author's permission. <http://www.vtpi.org>



COUNTY OF LOS ANGELES

FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294
(323) 890-4330



P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN

October 27, 2005

Ms. Connie Chung
Department of Regional Planning
Community Studies I Section
320 West Temple Street
Los Angeles, CA 90012

Dear Ms. Chung:

NEGATIVE DECLARATION, PROJECT NO. RADV200500007, DENSITY BONUS ORDINANCE, "LOS ANGELES COUNTY" – (FFER #200500156)

The Negative Declaration has been reviewed by the Planning Division, Land Development Unit, and Forestry Division of the County of Los Angeles Fire Department. The following are their comments:

LAND DEVELOPMENT UNIT:

1. This project does not propose construction of structures or any other improvements at this time. Therefore, until actual construction is proposed the project will not have a significant impact to the Fire Department, Land Development Unit.
2. Should any questions arise regarding subdivision, water systems, or access, please contact the County of Los Angeles Fire Department, Land Development Unit's EIR Specialist at (323) 890-4243.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS	BRADBURY	CUDAHY	HAWTHORNE	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESIA	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA PUENTE	MAYWOOD	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CARSON	DUARTE	HUNTINGTON PARK	LAKEWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CERRITOS	EL MONTE	INDUSTRY	LANCASTER	PALMDALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	CLAREMONT	GARDENA	INGLEWOOD	LAWDALE	PALOS VERDES ESTATES	ROSEMEAD	WALNUT
BELL GARDENS	COMMERCE	GLEN DORA	IRWINDALE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	COVINA	HAWAIIAN GARDENS	LA CANADA FLINTRIDGE	LYNWOOD	PICO RIVERA	SANTA CLARITA	WESTLAKE VILLAGE
			LA HABRA				WHITTIER

Ms. Connie Chung
October 27, 2005
Page 2

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division include erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours,

A handwritten signature in dark ink, appearing to read "David R. Leininger", with a stylized, flowing script.

DAVID R. LEININGER, CHIEF, FORESTRY DIVISION
PREVENTION SERVICES BUREAU

DRL:lc